

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

INFORMATION

COUNT ONE

The United States Attorney charges:

THE CONSPIRACY AND ITS OBJECTS

1. From on or about October 16, 2020, and continuing thereafter until on or about November 16, 2020, in the Western District of Pennsylvania, the defendant, TAMMY SHIFFLETT, a co-conspirator known to the United States Attorney as DW, and other individuals unknown to the United States Attorney, knowingly and willfully did conspire, combine, confederate and agree together and with each other, to commit an offense against the United States, that is, false statement in connection with the acquisition of a firearm, in violation of Title 18, United States Code, Section 922(a)(6).

MANNER AND MEANS OF THE CONSPIRACY

It was a part of the conspiracy that:

2. Unknown individuals would provide the defendant, TAMMY SHIFFLETT, money for the purchase of firearms.

3. DW, and other unknown individuals, would direct the defendant, TAMMY SHIFFLETT, to purchase firearms.

4. The defendant, TAMMY SHIFFLETT, would state on ATF Form 4473 that she was purchasing a firearm for herself, when in truth and fact, and as TAMMY SHIFFLETT well knew and believed, she was purchasing that firearm at the direction of another.

5. The defendant, TAMMY SHIFFLETT, would deliver firearms to DW and other unknown individuals.

OVERT ACTS

6. In furtherance of the conspiracy, and to effect the objects of the conspiracy, the defendant, TAMMY SHIFFLETT, DW, and other unknown individuals, did commit and cause to be committed, the following overt acts, among others, in the Western District of Pennsylvania:

a. On or about October 16, 2020, the defendant, TAMMY SHIFFLETT, agreed to meet DW at the Monroeville Gun Show to purchase firearms;

b. On or about October 17, 2020, the defendant, TAMMY SHIFFLETT, met individuals unknown to the United States Attorney at the Monroeville Gun Show at the direction of DW;

c. On or about October 17, 2020, the defendant, TAMMY SHIFFLETT, in connection with the acquisition of a Glock, model 17, 9mm caliber pistol, bearing serial number WMP998, from Trinity Armory, a federally licensed firearms dealer, stated on ATF Form 4473 that she was purchasing said firearm for herself, when in truth and fact, and as TAMMY SHIFFLETT well knew and believed, she was purchasing said firearm at the direction of a person, whose name is unknown to the United States Attorney, intending to deliver it to that person's possession and control;

d. On or about October 17, 2020, the defendant, TAMMY SHIFFLETT, in connection with the acquisition of a Glock, model 19X, 9mm caliber pistol, bearing serial number BRGF879, from Trinity Armory, a federally licensed firearms dealer, stated on ATF Form 4473 that she was purchasing said firearm for herself, when in truth and fact, and as TAMMY SHIFFLETT well knew and believed, she was purchasing said firearm at the direction of a person, whose name is unknown to the United States Attorney, intending to deliver it to that person's possession and control;

e. On or about October 17, 2020, the defendant, TAMMY SHIFFLETT, in connection with the acquisition of an Apache Armaments, model AA15, semiautomatic rifle, bearing serial number 00298, from Michael M. Petronio, a federally licensed firearms dealer, stated on ATF Form 4473 that she was purchasing said firearm for herself, when in truth and fact, and as TAMMY SHIFFLETT well knew and believed, she was purchasing said firearm at the direction of a person, whose name is unknown to the United States Attorney, intending to deliver it to that person's possession and control;

f. On or about October 17, 2020, the defendant, TAMMY SHIFFLETT, in connection with the acquisition of a Grapevine Security Associates, model AM15 receiver, bearing serial number 20186121, from Grapevine Security Associates, a federally licensed firearms dealer, stated on ATF Form 4473 that she was purchasing said firearm for herself, when in truth and fact, and as TAMMY SHIFFLETT well knew and believed, she was purchasing said firearm at the direction of a person, whose name is unknown to the United States Attorney, intending to deliver it to that person's possession and control;

g. On or about October 17, 2020, the defendant, TAMMY SHIFFLETT delivered the firearms purchased at the Monroeville Gun Show to individuals unknown to the United States Attorney at the direction of DW;

h. On or about November 1, 2020, the defendant, TAMMY SHIFFLETT, met DW at Dunham's Sports, a federally licensed firearms dealer;

i. On or about November 1, 2020, DW directed the defendant, TAMMY SHIFFLETT, to purchase firearms from Dunham's Sports;

j. On or about November 1, 2020, the defendant, TAMMY SHIFFLETT, placed a Taurus, model G3C, 9mm caliber pistol, bearing serial number ABK061358, and a Springfield Armory, model XDS-45 ACP, .45 ACP caliber pistol, bearing serial number BY320612, on layaway at Dunham's Sports;

k. On or about November 16, 2020, the defendant, TAMMY SHIFFLETT, in connection with the acquisition of a Taurus, model G3C, 9mm caliber pistol, bearing serial number ABK061358, and a Springfield Armory, model XDS-45 ACP, .45 ACP caliber pistol, bearing serial number BY320612, from Dunham's Sports, a federally licensed firearms dealer, stated on ATF Form 4473 that she was purchasing said firearm for herself, when in truth and fact, and as TAMMY SHIFFLETT well knew and believed, she was purchasing said firearms at the direction of DW, intending to deliver it to that person's possession and control; and

l. On or about November 16, 2020, the defendant, TAMMY SHIFFLETT, provided the firearms purchased at Dunham's Sports to DW.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

The United States Attorney further charges:

On or about November 16, 2020, in the Western District of Pennsylvania, the defendant, TAMMY SHIFFLETT, in connection with the acquisition of a firearm from a licensed dealer, did knowingly make a false statement, intending to deceive said licensed firearms dealer with respect to such firearm, to wit: the defendant, TAMMY SHIFFLETT, in connection with the acquisition of:

1. a Taurus, model G3C, 9mm caliber pistol, bearing serial number ABK061358;
and
2. a Springfield Armory, model XDS-45 ACP, .45 ACP caliber pistol, bearing serial number BY320612,

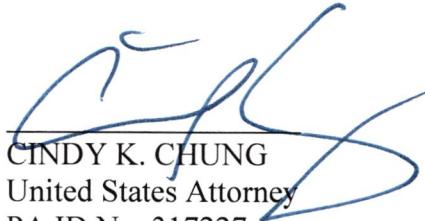
from Dunham's Sports, a federally licensed firearms dealer, stated on ATF Form 4473 that she was purchasing said firearms for herself and that she was not an unlawful user of, nor addicted to, any controlled substance, when in truth and fact, and as TAMMY SHIFFLETT well knew and believed, she was purchasing said firearm at the direction of DW, intending to deliver it to his possession and control, and as TAMMY SHIFFLETT well knew and believed, she was an unlawful user of, and addicted to, cocaine base, in the form commonly known as crack.

In violation of Title 18, United States Code, Section 922(a)(6).

FORFEITURE ALLEGATION

1. The United States Attorney re-alleges and incorporates by reference the allegations contained in Count Two of this Information for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

2. As a result of the knowing commission of the violation of Title 18, United States Code, Section 922(a)(6), charged in Count Two of the Information, the firearm alleged in that Count, that is, the Taurus, model G3C, 9mm caliber pistol, bearing serial number ABK061358, which was involved and used in the knowing commission of that offense, is subject to forfeiture pursuant to Title 18, United States Code, Section 924(d)(1).



CINDY K. CHUNG
United States Attorney
PA ID No. 317227